REMARKS

Claims 1-53 are pending. Claims 4-7 stand rejected under 35 USC §112, second paragraph as failing to set forth the subject matter which applicant regards as their invention. Claims 16-30 and 47 stand rejected under 35 USC §101 because the claimed invention is directed to non-statutory subject matter. Claims 1-53 stand rejected under 35 USC §102(e) as being anticipated by U.S. Patent Application Publication No. 2003/0005159 to Kumhyr.

Reconsideration is requested. The rejections are traversed. No new matter is added. Claims 1, 3-7, 9, 11-17, 19-21, 23-24, 29, 31-32, 34, 36, 39-40, 42, 44-45, 47-48, 51, and 53 are amended. Claims 49 and 50 are canceled. Claims 54 and 55 are added. Claims 1-48 and 51-55 remain in the case for consideration.

OBJECTIONS TO THE SPECIFICATION

The Applicant has amended the specification to remove the embedded hyperlink. The Applicant has also amended the specification to include the application serial number of the related prior art.

REJECTIONS UNDER 35 U.S.C. § 112, ¶ 2

The Examiner has rejected claims 4-7 under 35 U.S.C. § 112, ¶ 2, as failing to set forth the subject matter which applicants regard their invention. The Applicant has amended claims 4-7 and believes that claims 4-7 are now definite.

REJECTIONS UNDER 35 U.S.C. § 101

The Examiner has rejected claims 16-30 and 47 as being directed towards non-statutory subject matter. Claims 16 and 47 have been amended to recite "a computer-implemented method", and the Applicant believes that claims 16-30 and 47 are now directed towards statutory subject matter.

REJECTIONS UNDER 35 U.S.C. § 102(e)

Referring to claim 1, the invention is directed towards an apparatus for presenting content to a user, comprising: a plurality of layout strings files; a plurality of layout information files to describe how a layout string is displayed; and a computer to store the layout strings files and the layout information files.

Referring to claim 16, the invention is directed towards a computer-implemented method for displaying content to a user, comprising: locating a layout information file from a plurality of layout information files specifying how a layout string is to be presented to the user; locating one of a plurality of layout strings files storing the layout string; and presenting the layout string to the user according to the located layout information file.

Referring to claim 31, the invention is directed towards one or more computer-readable media containing a program to display content to a user, comprising: location software to locate a layout information file from a plurality of layout information files specifying how a layout string is to be presented to the user; location software to locate one of a plurality of layout strings files storing the layout string; and presentation software to present the layout string to the user according to the located layout information file.

Referring to claim 39, the invention is directed towards an article comprising: a computer-readable modulated carrier signal; means embedded in the signal for locating a layout information file from a plurality of layout information files specifying how a layout string is to be presented to a user; means embedded in the signal for locating one of a plurality of layout strings files storing the layout string; and means embedded in the signal for presenting the layout string to the user according to the located layout information file.

Referring to claim 47, the invention is directed towards a computer-implemented method for using a selected context to display content to a user, comprising: locating a layout information file from a plurality of layout information files specifying how the content is to be presented to the user; locating a layout strings file storing a layout string in the selected context; and presenting the content and the layout sting in the selected context to the user according to the located layout information file.

Referring to claim 48, the invention is directed towards a gadget file structure, comprising: a first directory storing at least two layout strings files, each layout strings file storing a layout string in a language; a second directory storing at least one layout information file for a device, the layout information file designed to be combined with one of the layout strings files and content to display the layout string and the content to a user in a selected language on the device; a third directory storing at least one alternative layout information file for the device, the alternative layout information file designed to be combined with one of the layout strings files and the content to display the layout string and the content to the user in the selected language on the device; and a resource file map identifying valid combinations of layout information files in the third directory and languages in which the layout strings files store layout strings for the device.

Referring to claim 53, the invention is directed towards an apparatus for presenting content to a user, comprising: a file storing a plurality of layout strings sub-files and a plurality of layout information sub-files to describe how content and a layout string are displayed; a resource file map to store at least two combinations of the layout information sub-file and languages in which the layout strings sub-files store the layout strings; a computer to store the file and the resource file map; a ranked list of languages; and a selector to select the one layout information sub-file of the plurality of layout information files and one layout strings sub-file based on the ranked list of languages and the resource file map.

Referring to claim 54, the invention is directed towards a gadget file structure, comprising: a first directory storing at least two layout strings files, each layout strings file storing a layout string in a language; a second directory storing at least one layout information file for a device, the layout information file designed to be combined with one of the layout strings files and content to display the layout string and the content to a user in a selected language on the device; a third directory storing at least one layout information file for a second device, the layout information file designed to be combined with one of the layout strings files and the content to display the layout string and the content to the user in the selected language on the second device; and a resource file map identifying valid combinations of layout information files and languages in which the layout strings files store layout strings for the device.

In contrast, Kumhyr teaches a method and system for generating and serving multilingual web pages. According to paragraph 50, to generate multi-lingual web pages, Kumhyr starts with a language-neutral HTML source document. In paragraph 51, Kumhyr then teaches that the language-neutral HTML web page contains directives indicating the location of language-specific content strings. As taught in paragraph 52 of Kumhyr, as a directive is identified in the language-neutral page, the particular content for that language is retrieved from a database, and inserted into the generated web page.

In FIG. 6, Kumhyr shows a flowchart for generating a language-specific HTML page. At step 608 a language-neutral source document is obtained. Then, at decision block 610, if the language-neutral source document contains any content directives, then a content key and a database identifier are obtained from the content directive at steps 612 and 614, respectively. Using the content key, the appropriate language value is retrieved from the database at step 616, and then at step 618, the content is inserted into the language-specific document.

Claims 1, 16, 31, 39, 47, 48, and 53-54 all include a plurality of layout strings files. The layout strings are defined on page 6, lines 14-15 as being "strings that are displayed on the gadget that are language dependent." The layout strings are retrieved from a layout strings file that is shown in FIG. 5 of the specification. As provided in page 7, lines 30-33 of the specification, "[l]ayout strings file 505 shows substitution strings from the title string, text strings 1, 2, and 3, and a particular graphic image to use in a graphic box. Similarly, layout strings file 510 shows substitution strings for the title string, text strings 1, 2, and 3, and a particular graphic image to use in a graphic box for Spanish language 225." In other words, layout strings file 505 contains English language strings and layout strings file 510 contains Spanish language strings for the same content or gadget.

Claims 1, 16, 31, 39, 47, 48, and 53-54 also include a plurality of layout information files. As used in the present application, a layout information file can be used to describe how to display a gadget, how to combine gadgets, display gadgets on different display types. Layout information files can also describe how to display a gadget based on a preferred language.

The Examiner cites to FIG. 2A of Kumhyr, as teaching a plurality of layout strings files. The Examiner cites to the language-neutral HTML source file as teaching a layout information file. In order to support a rejection under 35 U.S.C. § 102(e), a cited reference must teach every feature in the claims, and that combining features must render the invention to be operable.

The language-specific URLs that the Examiner cites to as teaching a plurality of language strings files cannot be combined with the language-neutral HTML source page shown in FIG. 4 of Kumhyr to provide the functionality that is claimed in the present invention. Both files that the Examiner cites to are HTML files. The files shown in FIG. 2A of Kumhyr show that to display a web page in a different language, each language-specific web page can be described in a separate HTML page, with a separate URL. For example, a French language web page could be accessed at a URL that ends with "fr", and a German web page at the same URL but ending with a "de". This is acknowledged by Kumhyr to be prior art.

To avoid the need for multiple HTML files, one for each language, Kumhyr teaches a language-neutral HTML page in paragraphs 50-53. The language-neutral HTML page includes content directives that describe where language-specific text should be retrieved and inserted into the language-neutral page to create a language-specific web page. With the language-neutral HTML page, there is a single URL that supports multiple languages, rather

than multiple URLs depending on the desired language as shown in FIG. 2A. Also, instead of including the text strings in the language-neutral HTML page, directives are included that identify where language-specific text strings are to be retrieved from a database.

Kumhyr does not teach or suggest how to get a string from a language-specific HTML file shown in FIG. 2A, and insert the string in a language-neutral HTML page. Indeed the content directives in the language-neutral HTML only contain information on where a particular language string should be accessed from a database; Kumhyr does not teach or suggest that the language strings would be obtained from a language-specific HTML used in prior art. To the contrary, Kumhyr teaches retrieving such strings from a multilingual content database 324 (*see* paragraphs 49 and 51).

In addition, the database used by Kumhyr is not a plurality of files, but simply a single multilingual content database, as shown in FIG. 3B of Kumhyr. Kumhyr does not describe any structure for the multilingual content database. As the present application describes multiple layout strings files to store different language text strings, Kumhyr does not teach the plurality of layout strings files as claimed

Finally, claims 1, 16, 31, 39, 47, 48, and 53-54 all include a plurality of layout information files to describe how a layout string is displayed. By using multiple layout information files, content in gadgets can be combined, strings can be inserted in different languages, and strings can be displayed in a format that is appropriate for a particular display device.

Kumhyr does not teach more than one language-neutral source file for a particular content. As shown in step 608 of FIG. 6, Kumhyr teaches that each URL has one language-neutral web page. Kumhyr does not teach using more than one language-neutral source file for the same URL. Kumhyr does not need to have more than one language-neutral source file, because Kumhyr does not teach anything more than customization of an HTML document by insertion of language-specific strings. Kumhyr simply provides a language-neutral HTML source page that includes directives about what strings to retrieve from a multilingual content database. Thus, Kumhyr does not teach or suggest combining information from more than one gadget, or alternative formats depending on the display.

Because Kumhyr fails to teach or suggest a plurality of layout strings files or a plurality of layout information files that describe how a layout string is to be displayed, claims 1, 16, 31, 39, 47, 48, and 53, 54 are patentable under 35 U.S.C. § 102(e). Accordingly claims 1, 16, 31, 39, 47, 48, and 53 are allowable, as are dependent claims 2-15, 17-30, 32-38, 40-46, 51-52, and 55.

Referring to claim 5, the invention is directed towards an apparatus according to claim 3, wherein: each layout information file defines how the layout string is displayed in a different language on a different device; and the resource file map stores combinations of layout information files, languages in which the layout strings files store the layout strings, and identities of devices upon which the information can be displayed.

Referring to claim 6, the invention is directed towards an apparatus according to claim 3, wherein: each layout information file defines how the layout string is displayed on a different device; and the resource file map stores combinations of the layout information files, languages in which the layout strings files store the layout strings, and identities of devices upon which the information can be displayed.

Referring to claim 13, the invention is directed towards apparatus according to claim 1, further comprising a device to display the layout string according to the layout information files, thereby presenting the layout string to user.

Referring to claim 15, the invention is directed towards apparatus according to claim 14, further comprising a device to display the content and the layout string according to the layout information files, thereby presenting the content to the user.

Referring to claim 22, the invention is directed towards a method according to claim 21, wherein: the method further comprises determining a device on which to display the content to the user; accessing a resource file map includes accessing a resource file map listing all combinations of layout information files, languages, and devices; and identifying the selected language includes identifying the selected language from the resource file map based on the ranked list of languages and the device.

Referring to claim 23, the invention is directed towards a method according to claim 22, wherein locating a layout information file from a plurality of layout information files includes locating a default layout information file specifying how the content is to be presented to the user if the resource file map does not specify a combination including a particular layout information file and at least one of the device or one of the languages in the ranked list of languages.

Referring to claim 26, the invention is directed towards a method according to claim 17, further comprising determining a device on which to display the content to the user.

Referring to claim 27, the invention is directed towards a method according to claim 26, wherein locating a layout information file includes locating the layout information file specifying how the content is to be presented to the user on the device.

Referring to claim 28, the invention is directed towards a method according to claim 26, wherein locating the one of the plurality of layout strings files further includes locating the one of the plurality of the layout strings files storing device-dependent layout strings.

Referring to claim 29, the invention is directed towards a method according to claim 26, wherein presenting the content and the layout string includes presenting the content and the layout string to the user on the device according to the located layout information file.

Referring to claim 48, the invention is directed towards a gadget file structure, comprising: a first directory storing at least two layout strings files, each layout strings file storing a layout string in a language; a second directory storing at least one layout information file for a device, the layout information file designed to be combined with one of the layout strings files and content to display the layout string and the content to a user in a selected language on the device; a third directory storing at least one alternative layout information file for the device, the alternative layout information file designed to be combined with one of the layout strings files and the content to display the layout string and the content to the user in the selected language on the device; and a resource file map identifying valid combinations of layout information files in the third directory and languages in which the layout strings files store layout strings for the device.

Referring to claim 51, the invention is directed towards gadget file structure according to claim 48, wherein: the at least one alternative layout information file includes a language-dependent layout information file for the device, the language-dependent layout information file designed to be combined with one of the layout strings files and the content to display the layout string and the content to the user in the selected language on the device; and the resource file map further identifies valid combinations of layout information files in the third directory and languages in which the layout strings files store layout strings for the device.

Referring to claim 54, the invention is directed towards a gadget file structure, comprising: a first directory storing at least two layout strings files, each layout strings file storing a layout string in a language; a second directory storing at least one layout information file for a device, the layout information file designed to be combined with one of the layout strings files and content to display the layout string and the content to a user in a selected language on the device; a third directory storing at least one layout information file for a second device, the layout information file designed to be combined with one of the layout strings files and the content to display the layout string and the content to the user in the selected language on the second device; and a resource file map identifying valid

combinations of layout information files and languages in which the layout strings files store layout strings for the device.

Referring to claim 55, the invention is directed towards a gadget file structure according to claim 54, wherein the resource file map further identifies valid combinations of layout information files in the third directory and languages in which the layout strings files store layout strings for the second device.

Claims 5-6, 13, 15, 22-23, 26-29, 48, 51, and 54-55 include a layout information file that specifies how content is to be displayed on a particular device. For example, content displayed on a portable device will likely be only important text, omitting graphics and other supplemental information that might be displayed on a standard monitor. A layout information file can similarly describe how to display content that is extra lengthy or include other directives in how to display content.

Kumhyr's language-neutral HTML source document describes where to insert language-specific text strings and where in a database to retrieve the language-specific text. Kumhyr does not teach or suggest different ways to present content depending on the display device. Kumhyr's language-neutral source document only provides for including directives about where the text strings are to be inserted. Indeed, Kumhyr does not discuss the possibility of displaying content on any device other than a standard display, and so Kumhyr does not teach a formatting of content other than a standard format.

The Examiner cites to the various devices in FIG. 1A as Kumhyr teaching more than one type of display device. However, FIG. 1A is a representation of prior art, and is discussed only in reference to types of devices that might be connected to the network. Kumhyr does not describe his invention as considering the display type when teaching the generation of a language-specific HTML page. Instead, Kumhyr simply teaches display of language-specific web pages on a standard monitor.

Because Kumhyr does not teach or suggest a layout information file that describes how language strings and content are to be displayed on a particular device, claims 5-6, 13, 15, 22-23, 26-29, 48, 51, and 54-55 are patentable under 35 U.S.C. § 102(e). Accordingly, claims 5-6, 13, 15, 22-23, 26-29, 48, 51, and 54-55 are allowable.

Referring to claim 8, the invention is directed towards an apparatus according to claim 2, wherein each layout strings file includes a layout string in one language.

The Examiner has cited to paragraph 47 of Kumhyr as teaching this feature. The Applicant points out that in paragraph 47, Kumhyr is not teaching or suggesting anything to

do with a language string file, but instead is clarifying that in different contexts, the word "language" can represent different concepts. In paragraph 47, Kumhyr notes that "[w]eb pages may comprise a variety of "languages", including computer-oriented languages and human languages. For example, the content within a Web page may be written in one or more human languages, such as English and French. At the same time, the Web page may contain one or more computer-oriented languages, such as a markup language".

Indeed, rather than teaching that a layout strings file contains layout stings in one language, paragraph 47 of Kumhyr is simply a statement that in addition to human languages, there can also be computer languages. In paragraph 47, Kumhyr clarifies that human languages for expressing content are being addressed in Kumhyr's patent, rather than computer languages.

The Applicant is unclear how this clarification on what is meant by language, teaches that each layout string file is defined by a layout string in a language-specific file. Because Kumhyr fails to teach or suggest each layout string defined by a layout string in a language-specific file, claim 8 is patentable under 35 U.S.C. § 102(e). Accordingly, claims 8 and 9 are allowable.

Referring to claim 10, the invention is directed towards an apparatus according to claim 2, wherein each layout strings file includes a language image in the language.

The Examiner asserts that it is inherent for Kumhyr to display image information defined in the language-specific file. While Kumhyr describes the language-neutral file as being free of any language specific content strings, Kumhyr is explicitly referring to strings of text. FIG. 5 of Kumhyr shows example content in the multilingual content database. In FIG. 5, author strings are listed. In paragraph 49 of Kumhyr, he teaches, "directives require the retrieval of content strings from multilingual content database" and that language-specific content strings are inserted into a language-neutral HTML page. Kumhyr does not similarly teach that other types of content, such as images, can also be localized and stored in the multilingual content database.

As images themselves can be language-neutral, it is unclear why the Examiner thinks that a language-specific image must inherently be included in Kumhyr's system and method for generating content specific language. Indeed, given that images can be language-neutral, and given that Kumhyr does not teach or suggest how language-specific images are identified and stored, the Applicant believes that Kumhyr, in fact, does not teach retrieval and generation of language-specific images.

Because Kumhyr does not teach or suggest storing image information in a language-specific file, and because localization of images is not inherently part of Kumhyr's method and system for generating and serving multilingual web pages, claim 10 is patentable under 35 U.S.C. § 102(e). Accordingly, claims 10 and 11 are allowable.

For the foregoing reasons, reconsideration and allowance of claims 1-48 and 50-55 of the application as amended is solicited. The Examiner is encouraged to telephone the undersigned at (503) 222-3613 if it appears that an interview would be helpful in advancing the case.

Respectfully submitted,

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